



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN - 9 2016

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

David P. Alldian
President and Chief Executive Officer
Blue Tee Corp.
250 Park Avenue S.
Suite 203
New York, New York 10003

RE: Request for Information Under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. 9604(e)

Dear Mr. Alldian,

Pursuant to section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604, the United States Environmental Protection Agency (EPA) requests information regarding financial, legal and equitable commitments and obligations by Blue Tee Corporation ("Blue Tee") at various Superfund sites nationwide. Section 104(e)(2) provides in relevant part that the EPA may require any person who has, or may have, information relevant to the ability of an entity to pay for or perform a response action to furnish relevant information and documents. The EPA believes that the information requested is essential to evaluate Blue Tee's ability to fulfill its obligations at a number of Superfund sites. To assist Blue Tee in preparing a response, the information request includes the following list of sites where the EPA has identified that Blue Tee may have current and/or future obligations under CERCLA settlements or orders. The site list is not comprehensive or exhaustive (see Information Request Question #1).

1. ASARCO Taylor Springs, EPA ID ILN000508170
2. Old American Zinc Plant, EPA ID IL0000034355
3. Sauget Area 2, EPA ID ILD000605790
4. Cherokee County, EPA ID KSD980741862
5. Oronogo-Duenweg Mining Belt, EPA ID MOD980686281
6. American Zinc & Lead Smelting, EPA ID KSD984971986
7. Carpenter Snow Creek Mining District, EPA ID MT0001096353
8. Gilt Edge Mine, EPA ID SDD987673985

9. American Lead and Zinc Mill, EPA ID CON000802649
10. Grandview Mine and Mill, EPA ID WASFN1002165
11. Tar Creek, EPA ID OKD980629844

The EPA requires that you provide the information requested in Attachment B within twenty (20) business days of receipt of this letter. Compliance with this information request is mandatory. Section 104(e) of CERCLA authorizes the EPA to pursue penalties for failure to comply with or respond adequately to an information request. In addition, providing false, fictitious or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. 1001.

Your response must include the following certification signed and dated by an authorized representative of Blue Tee:

I certify that the information contained in this response to the EPA's request for information and the accompanying documents is true, accurate, and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: _____
Name: _____
Title: _____

You are entitled to assert a claim of business confidentiality in the manner described in 40 C.F.R. 2.203(b) covering any part or all of the information you provide. Information subject to a claim of business confidentiality will be made available to the public only in accordance with 40 C.F.R. Part 2, Subpart B. Unless a claim of business confidentiality is asserted at the time your answer is submitted, the EPA may make this information available to the public without further notice to you. Note, that a claim of business confidentiality does not permit you to avoid answering any request for information.

This request for information is not subject to the review and approval requirements of the Paperwork Reduction Act, 44 U.S.C. 3501, et. seq.

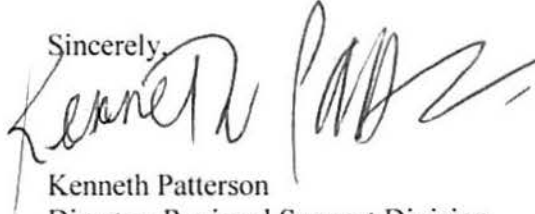
Please send your reply to:

Robert Roberts
U.S. EPA
1200 Pennsylvania, Ave. N.W.

MC: 2272A
Washington, DC 20460

Thank you for your prompt attention to this matter. If you have any questions concerning this information request, please contact Bob Roberts (roberts.robert@epa.gov; 202-564-4267) or David Dowton (dowton.david@epa.gov; 202-564-4228) in the Office of Site Remediation Enforcement.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth Patterson", with a stylized flourish at the end.

Kenneth Patterson
Director, Regional Support Division
Office of Site Remediation Enforcement

Attachments (2)

CC: Terri G. Faye, Esq.
1 North Maple Avenue
Greensburg, Pennsylvania 15601

Gerald P. Greiman, Esq.
1 North Brentwood Boulevard
Suite 1000
St. Louis, Missouri 63105

Attachment A
Information Request Instructions and Definitions

Instructions

1. Identify the person(s) responding to these questions on behalf of the Respondent. Provide the name, title, address and phone number of the individual(s).
2. Please provide a separate narrative response to each request. Identify all persons consulted in the preparation of each response and provide all documents requested, relied upon or related to your response. For each document produced, indicate on the document, or in some other reasonable manner, the number of the Request to which it responds, the current location and custodian of the document, the date it was originally prepared and the person who prepared the document. Documents may be provided electronically provided the electronic copy submitted is a true and complete copy of the document and can be readily viewed using Microsoft Word, Excel or as a pdf.
3. The information requested herein must be provided even though Respondent may contend that it includes possibly confidential information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, as amended by SARA, 42 U.S.C. 9604(e)(7)(E) and (F), and 40 C.F.R. 2.203(b), by attaching to such information at the time it is submitted, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," or "proprietary" or "company confidential." Information covered by such a claim will be disclosed by the EPA only to the extent, and only by means of the procedures set forth in statutes and regulation set forth above. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice. You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.
4. While Respondent may object to certain requests for information, respondent must provide responsive information notwithstanding those objections. To object without providing responsive information may subject Respondent to an enforcement action, including penalties for non-compliance.
5. If additional responsive information or documents becomes known or available after you have submitted your response, the EPA hereby requests pursuant to Section 104(e) of CERCLA that you supplement your response to EPA with the additional information or documents. Failure to do so may subject you to penalties as set forth in the cover letter. Moreover, should you find, at any time after the submission that any portion of your response is false, incomplete or misrepresents the facts, you must

immediately notify the EPA and provide the EPA with a corrected response as soon as possible.

Definitions

1. The term "you" or "Respondent" shall mean Blue Tee Corporation, its successors, officers, managers, employees, contractors, assigns, and agents.
2. The terms "document" or "documents" shall mean any object that records, stores, presents or transmits information. "Document" shall include, but not be limited to:
 - a. writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including (by way of illustration and not by way of limitation) any of the following:
 - i. e-mail, letter, correspondence, fax, telegram, postcard;
 - ii. record book, minutes, memorandum of telephone and other conversations, telephone messages, intra or interoffice communications;
 - iii. log book, diary, calendar, desk pad, scrapbook, notebook;
 - iv. bulletin, circular, form, pamphlet, statement;
 - v. letter, report, notice, analysis;
 - vi. graph or chart;
 - vii. data; or
 - viii. copy of any document.
 - b. microfilm or other film record, photograph, or sound recording on any type of device;
 - c. any tape, disc or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such tape, disc, or other type of memory and together with printouts of such tape, disc, or other type of memory);
 - d. attachments to, or enclosures with, any document as well as any document referred to in any other document; and (a) every copy of each document which is not an exact duplicate of a document which is produces, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every document referred to in any other document.
3. The terms "identify" or "provide the identity of" means, with respect to a document, to provide: (a) its customary business description (e.g., letter, invoice); (b) its date; (c) the identity of the author, addressor, addressee, and/or recipient; and (d) in cases where a copy of the document cannot be provided, a summary of the substance or the subject matter.
4. The term "identify" means, with respect to an individual, to set forth: (a) the person's full name; (b) present or last known business and home address and telephone

numbers; (c) full name and address of last known employer; and (d) title or position with present or last known employer.

5. The term "identify" means, with respect to a corporation, partnership, or other business entity (including a sole proprietorship), to provide its full name, address, and affiliation with the individual and/or company to which/which this request is addressed.
6. The terms "and" and "or" shall be construed either disjunctively or conjunctively, as necessary, to bring within the scope of this Information Request any information which might otherwise be construed as outside its scope.
7. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular request or requests.
8. All terms not identified herein shall have their ordinary meaning, unless such terms are defined in CERCLA, or 40 C.F.R. Parts 260-280, in which case the statutory or regulatory definitions shall apply.

Attachment B
Information Request

1. Identify any additional site(s) not listed in the cover letter where Respondent has, or believes it may have, liability and/or commitments or obligations under CERCLA. Provide the name of the site, the nature or basis of liability, and a copy of any settlement or order. Provide a dollar estimate of Respondent's obligation for each site identified, including those sites identified in the cover letter.
2. Provide the legal form of Respondent's business organization during the last five years (e.g., corporation, partnership, subchapter S corporation, etc.). Include the state and date of incorporation. Provide a copy of the most current Articles of Incorporation and By-laws of Respondent.
3. Provide all corporate minutes, resolutions of the board of directors, and written business plans, created during the last five years.
4. Provide the name and address of all Respondent's principal stockholders and members of the board of directors. Provide the number of shares owned by each stockholder and member of the board of director. If more than 8 shareholders, only provide those with an ownership interest of five (5) percent or more. If Respondent is a partnership, list all partners and ownership percentage.
5. Provide the name and address of Respondent's current, (and for previous five years), officers and number of shares held by each. For partnerships, list all partners for the last three years.
6. Provide a detailed narrative describing the business and operational history of the Respondent over the last five years, including but not limited, to primary the sources of income, sales of significant assets, and changes in the ongoing operations of Respondent or any subsidiary.
7. Provide a detailed narrative of the present business operations and future business plans of the Respondent or any subsidiary.
8. List states and municipalities to which taxes have been and/or are being paid by Respondent. Describe the nature and amount of such taxes, and state the most recent year of payments and whether tax payments are current.
9. Provide last five years of tax returns Respondent filed with the United States' Internal Revenue Service. Note whether Respondent's federal tax obligations are current. Include the names and addresses of Respondent's independent certified public accountants for the last three years.

10. If Respondent has filed financial forms with any organization or governmental entity not previously identified, list the name(s) of the entity, the date and type of financial form.
11. Provide a Profit and Loss Statement and Balance Sheet for Respondent for each of the last five years. This document shall specify assets (e.g., cash, securities, certificates of deposit, stocks, bonds, real property, inventory, equipment, accounts receivable, cash value of life insurance policies for any officer, director, or board member, etc.) and liabilities (e.g., loans, mortgages, insurance premiums, deferred taxes, etc.). For any liability identified, include the entity owed, the nature of the instrument, the term, the original amount and the present balance.
12. If not captured in a previous answer, provide Respondent's gross income (including, but not limited to, sales, interest income, and dividends) and operating expenses (including, but not limited to, wages, overhead, lease payments, interest expense, and cost of sales) in each of the last five years
13. Provide the name and address of any bank, savings and loan association, or other such entities within the United States or elsewhere where Respondent maintains asset accounts. For any identified account provide the account number and the current balance.
14. List all commercial paper, negotiable or nonnegotiable, in which Respondent has any interest whatsoever, presently in transit or in the possession of any banking institution. Describe such paper and Respondent's interest therein, and state its present location. List all loans receivable in excess of \$10,000 and specify if due from an officer, stockholder or director.
15. If Respondent has engaged in any Joint Loan Agreement, including Letters of Credits, with any other organization describe all such agreements.
16. Describe any/all of Respondent's debt coinsured by another organization.
17. List all equity participation in other organizations, both domestic and foreign, in which Respondent has an interest, including the type, amount and terms of such interest.
18. List all debt participation in other organizations, both domestic and foreign, in which Respondent has an interest, including the type, amount and terms of such interest.
19. List corporate salaries, bonuses and/or drawings for Respondent's corporate officers (e.g., President, Vice President, Chairman, Secretary and Treasurer). Include the nature of the compensation paid including stock options, pensions, profit sharing, royalties or other deferred compensation.

20. List Respondents commercial activity (e.g., fields of activity resulting in income) and SIC code.
21. If Respondent has been the subject of any proceeding under the provisions of any State Insolvency Law, or the Federal Bankruptcy Act, provide for each instance the commencement date, the termination date, the relevant jurisdiction, and a summary of the discharge or disposition.
22. List all real estate, and personal property of an estimated value in excess of \$10,000 owned or under contract to be purchased or sold by Respondent. Provide location, contract price and the name and address of buyer/seller.
23. List all transfers of assets (real and/or personal) over \$10,000 made by Respondent, during the last five calendar years and state to whom the transfer was made. Described compensation, if any, paid by recipient of the asset transfer. If transfer was a gift, note accordingly.
24. List all transfers of assets (real and/or personal) over \$10,000 presently anticipated or under consideration to be made by Respondent, and state to whom the transfer may be made. Described compensation, if any, to be paid by recipient.
25. List all dividend payments, bonuses, transfers or distributions of any kind made by Respondent to any shareholder or officer in the last five years.
26. List all dividend payments, bonuses or transfers or distributions of any kind to any shareholder, officer or employee, presently anticipated, or under consideration by Respondent.
27. Provide details of any law suit now pending involving Respondent.
28. List names and addresses of any persons or other business entity holding funds in escrow or in trust for Respondent, or any of its subsidiaries or affiliates.
29. List all agreements or contracts, including but not limited to insurance policies, which may indemnify Respondent (including present or past owners, operators, partners, and /or shareholders), with respect to any costs that Respondent may have to pay due to response work at any site listed in the cover letter or identified by Respondent in Information Request Question 1. Provide a copy of such agreement, contract, and/or insurance policy. In addition, for any identified insurance policy state the name of the insurance company, the years the policy was in effect, the type of coverage provided (e.g., casualty, liability, pollution, umbrella, excess, primary, etc.), and the policy number if not identified on the policy.
30. Identify all previous settlements by Respondent (or Respondent's predecessors) with any insurer which relates in any way to environmental liabilities and/or to the policies referenced in Question 29 above. Include the settlement date, the scope of the release provided and the amount paid by the insurer. Provide a copy of all identified settlement

agreements.

31. Provide a list of all financial assurance required under CERCLA settlements or orders connected with the sites listed in the cover letter or identified by Respondent in Information Request Question 1 and state whether Respondent is currently in compliance with the requirements.
32. Provide in specific chronological detail all past and present financial, legal, and/or equitable relationships between Blue Tee and Gold Fields Mining, LLC. Document this submission (#32), and also indicate any and all information relevant to above Information Request Questions 1 – 31.